

J. BRUCE ALVERSON, ESQ.  
Nevada Bar No. 1339  
KARIE N. WILSON, ESQ.  
Nevada Bar No. 7957  
**ALVERSON TAYLOR  
MORTENSEN & SANDERS**  
6605 Grand Montecito Pkwy, Ste. 200  
Las Vegas, NV 89149  
702-384-7000 Phone  
702-385-7000 Fax  
Attorneys for Defendant  
Kiewit Infrastructure West Co.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CHAD KREISER, individually, CHRISTINA  
LOU KRIESER

Plaintiffs,

v.

K & B STEEL, A DIVISION of WABB  
INDUSTRIES, INC., a Texas Corporation;  
KIEWIT WESTERN CO. d/b/a LAKE MEAD  
CONSTRUCTORS, a Foreign Corporation;  
DOES I through X; inclusive; and ROE  
BUSINESS ENTITIES XI through XX,  
inclusive

Defendants.

CASE NO: 2:16-cv-01361-MMF- CWH

**STIPULATION AND PROPOSED  
ORDER TO ALLOW KIEWIT TO  
FILE A SUPPLEMENTAL  
MEMORANDUM TO ITS MOTION  
TO DISMISS OR ALTERNATIVELY,  
MOTION FOR SUMMARY  
JUDGMENT AND TO EXTEND  
DEADLINES RELATED THERETO  
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs, CHAD  
KREISER and CHRISTINA LOU KREISER, Defendant, KIEWIT INFRASTRUCTURE WEST  
CO., as successor through merger to KIEWIT WESTERN CO. d/b/a LAKE MEAD  
CONSTRUCTORS (hereinafter “Kiewit”), and K & B STEEL, A DIVISION OF WABB  
INDUSTRIES, INC., by and through their respective counsel of record, that Kiewit be permitted  
to file a supplemental memorandum, including correcting the name and date of substantial

completion of the project at issue and submitting an additional supporting affidavit, to its Motion to Dismiss or Alternatively, Motion for Summary Judgment, which was filed on May 11, 2018 (ECF No. 46). The proposed Supplemental Memorandum in Support of Defendant Kiewit Infrastructure West Co.'s Motion to Dismiss or Alternatively, Motion for Summary Judgment is attached hereto as Exhibit A.

IT IS FURTHER STIPULATED AND AGREED that the parties' responsive pleadings shall be due on or before June 15, 2018 allow the parties sufficient time to oppose Kiewit's motion and forthcoming Supplemental Memorandum on the merits.

This is the second stipulation for extension of time to extend deadlines regarding Kiewit's Motion to Dismiss.

Dated this 30<sup>th</sup> day of May, 2018.

CHRISTIANSEN LAW OFFICES

KRING & CHUNG, LLP

*/s/ Keely A. Perdue, Esq.*

*/s/ Robert L. Thompson, Esq.*

By \_\_\_\_\_  
PETER S. CHRISTIANSEN, ESQ.  
Nevada Bar No. 5254  
R. TODD TERRY, ESQ.  
Nevada Bar No. 6519  
KEELY A. PERDUE, ESQ.  
Nevada Bar No. 13872  
810 South Casino Center Blvd., Ste. 104  
Las Vegas, NV 89101  
702-240-7979 Phone  
866-412-6992 Fax  
*Attorneys for Plaintiffs*

By \_\_\_\_\_  
ROBERT P. MOUGIN, ESQ.  
Nevada Bar No. 7104  
ROBERT L. THOMPSON, ESQ.  
Nevada Bar No. 9920  
1050 Indigo Drive  
Las Vegas, NV 89145  
702-260-9500 Phone  
702-260-9434 Fax  
*Attorneys for Defendant K & B Steel, a  
Division of Wabb Industries, Inc.*

...

...

...

...

...

1 ALVERSON, TAYLOR  
2 MORTENSEN & SANDERS

3 /s/ Karie N. Wilson, Esq.

4 By \_\_\_\_\_  
5 J. BRUCE ALVERSON, ESQ.

6 Nevada Bar No. 1339

7 KARIE N. WILSON, ESQ.

8 Nevada Bar No. 7957

9 6605 Grand Montecito Pkwy, Ste. 200

10 Las Vegas, NV 89149

11 702-384-7000 Phone

12 702-385-7000 Fax

13 *Attorneys for Defendant*

14 *Kiewit Infrastructure West*

15 **(PROPOSED) ORDER**

16 IT IS HEREBY ORDERED that Defendant, KIEWIT INFRASTRUCTURE WEST CO.,  
17 as successor through merger to KIEWIT WESTERN CO. d/b/a LAKE MEAD  
18 CONSTRUCTORS, be permitted to file a supplemental memorandum, including correcting the  
19 name and date of substantial completion of the project at issue and submitting an additional  
20 supporting affidavit, to its Motion to Dismiss or Alternatively, Motion for Summary Judgment,  
21 which was filed on May 11, 2018 (ECF No. 46).

22 IT IS FURTHER ORDERED that the parties' responsive pleadings shall be due on or  
23 before June 15, 2018 allow the parties sufficient time to oppose Kiewit's motion and  
24 forthcoming Supplemental Memorandum on the merits.

Dated this 31st day of May, 2018.



U.S. DISTRICT COURT JUDGE